


**ICA**

# Idaho Cattle Association

November 18, 1997

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 BITTERROOT GRIZZLY BEAR EIS  
 P.O. Box 5127  
 Missoula, Montana 59806

RECEIVED BY U.S. FISH  
 AND WILDLIFE SERVICE  
 GRIZZLY BEAR RECOVERY  
 COORDINATORS OFFICE.

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Greetings,

The following comments are submitted on behalf of the Idaho Cattle Association concerning the Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem. The Idaho Cattle Association (ICA) is a non-profit association representing approximately 1500 cattle producers, feeders, agribusinesses and more than 25,000 individuals involved in the livestock industry in Idaho. Many of our members work and reside in areas directly or potentially affected by the grizzly bear recovery proposals contained in this DEIS.

ICA is unalterably opposed to efforts to reintroduce grizzly bears into any part of Idaho. We believe such sufficiently large populations of grizzlies exist in North America that this species can no longer be described as threatened. The continually expanding population goals of the U.S. Fish and Wildlife Service and bear advocacy groups, coupled with concurrent efforts to establish wilderness corridors throughout the West have caused us to lose all confidence in the integrity of any commitments to goals or citizen involvement.

We believe that recently occurring fatal grizzly bear attacks last year in Canada and the 1996 deaths of two Idaho citizens from grizzly attacks in Alaska occurring as the latest of a continuous string of such fatalities since the West was first explored, are sufficient evidence that reestablishment of this animal in proximity to human activity is not only unwarranted but criminal as well.

We are well aware that education regarding camping techniques and food handling can reduce incidence of campsite invasion by grizzlies to some degree. These techniques, however, offer little protection on the trail or during any chance encounters or during ranchyard or cowcamp attacks. We believe the risk to humans has been inadequately evaluated, particularly in areas where contact is apt to be most frequent.


Insufficient data exists to justify the low level of livestock losses estimated in the DEIS. To illustrate, in 1997 the more innocuous black bear, in only one incident caused the loss of over 325 sheep through panic. This was, at that time, only the latest in a series of similar incidents. It is important to be aware that the reduced grizzly numbers have been arrived at, in Idaho, as the result of real life experience, not estimates.

This DEIS is characterized throughout by the use of "best case" scenarios and statistics or studies. For example, the average loss of livestock in the Yellowstone Ecosystem is cited as being 29 (for 1994-1995). This is then extrapolated by formula to the Bitterroot Ecosystem, claiming low livestock losses to be expected from grizzly bear recovery. If, however, 1996-1997 (to date) were to be used the average jumps to 37. Since bear depredations tend to be localized, this would represent significant financial loss to a very few ranchers.

This association views with concern the repeated reference to linkage zone analysis and management contained in this DEIS. It appears that this portion of the plan is not to be subject to the public comment process. We are unable to determine congressional authority or agency regulations which would authorize the creation of "Corridor Special Management Areas" even if established within the NEPA process.

1 | The Idaho Cattle Association supports alternative three and remains adamantly opposed to any intervention by out of state entities concerning grizzly populations.

Sincerely,



Judy Woodie  
President

cc: Congressional Delegation  
Governor Phil Batt